

To: Phil Stetsman
F. 360.753.1112

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DEC 09 2005

Certification for a
Complaint to the Washington State Public Disclosure Commission Relating to an
Elected Official or Candidate for Public Office
(Notary Not Required)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth in this attached complaint are true and correct.

Your signature:

Scott Hamilton

Your printed name:

Scott Hamilton

Street address:

19727 SE 1912 St.

City, state and zip code:

Sumner WA 98075-9639

Telephone number:

425-392-1160

E-Mail Address: (Optional)

CITYHAMILTON@comcast.net

Date Signed:

12/8/05

Place Signed (City and County):

Sumner WA King

City

County

*RCW 9A.72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

COMPLAINT ATTACHED

Filed Separately

November 14, 2005

Mr. Kurt Young
Public Disclosure Commission
711 Capitol Way #206 - PO Box 40908
Olympia, WA 98504-0908
Tel (360) 753-1111
Fax (360) 753-1112
Toll Free - 1-877-601-2828

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NOV 16 2005

Public Disclosure Commission

Re: Citizens for Lynn Rehn; and
Friends of Steve Wirrick

Dear Mr. Young:

Foundation:

1. Lynn Rehn was a candidate for Sammamish City Council in the November 2005 election.
2. Her campaign committee is "Lynn Rehn for City Council."
3. According to the PDC website, Rehn's last C-4 filing prior to the election for expenditures was September 6, 2005.
4. According to the PDC website, Rehn's last C-3 filing prior to the election for contributions was October 27, 2005.
5. According to the PDC website, C-4 filings were required on October 18 and on November 1 prior to the election.
6. According to the PDC website, weekly filings on Mondays are due for C-3 contributions. The "2005 Key Reporting Dates for Candidates" is unclear whether this weekly filing is required whether a contribution is received the preceding week or not.
7. Rehn's campaign committee issued five general mailings to Sammamish voters between September 20, 2005, through and including November 7, 2005:
 - a. A 5 ½ x 11 inch green and blue post card mailer, presorted US postage paid; date received not recorded;
 - b. An 8 ½ x 11 inch green and blue post card mailer; presorted US postage paid; date received not recorded;
 - c. A photocopied letter to Gail Twelves "From the Desk of Dino Rossi", first class postage postmarked October 31, 2005;
 - d. A photocopied letter to Scott Hamilton "From the Desk of Dino Rossi"; first class postage postmarked November 1, 2005;
 - e. A photocopied letter "From the Desk of Cheryl Pflug", first class postage postmarked November 1, 2005;
 - f. An 8 ½ x 11 red and black postcard mailer, presorted postage paid, received on Monday, November 7.¹

¹ Originals of items 7a through 7f are enclosed in this Communication.

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8. Item 7c is a campaign endorsement for Rehn and Steve Wirrick, another candidate for Sammamish City Council.
9. Rehn produced yard signs in a number unknown to the Undersigned.
10. Wirrick produced yard signs in a number unknown to the Undersigned.
11. Wirrick placed an advertisement in the Sammamish Review at an unknown cost of approximately one-third page in size, black and white.²
12. Wirrick produced handouts for his doorbelling in a number unknown to the Undersigned. However, Wirrick claimed on his website to have doorbelled 5,000 homes, so it is logical to conclude he produced at least 5,000 handouts. It is unknown whether these were one- or two-sided.³
13. Wirrick produced a web site for his campaign, www.stevewirrick.org, at an unknown cost. The website had at least eight pages.
14. Wirrick elected to file under mini-reporting with the PDC, which limits fundraising and expenditures to \$3,500 and caps individual fundraising.
15. Robo calls were made on behalf of Rehn and Wirrick. The source of these robo calls was not identified on the calls.
16. A 5 ½ x 11 inch postcard mailer pre-sorted postage paid was made on behalf of Wirrick by the King County Republican Central Committee.⁴
17. The colors, size and format of the Rehn and Wirrick 5 ½ ix 11 mailers are substantially similar.

Apparent violations:

1. Rehn's failure to filing C-4s after September 6, 2005, violates the requirements as quoted above.
2. Rehn's failure to file C-3s on a weekly basis, and on Mondays, appears to violate the requirements as quoted above.
3. The professional production of three of the five Rehn mailers, and the first-class postage required for the mailers identified 7c, 7d, 7e and 7f⁵; the mailing costs of the mailers identified in 7a and 7b; and the cost of yard signs raise questions whether the total costs exceed the reported \$6,685 in campaign contributions and if so, what additional contributions if any have been made to the campaign. The absence of C4 expenditure filings makes it impossible to know the answers.
4. Item 7e does not properly identify the full campaign committee information of the source, specifically failing to disclose the address.
5. Item 7d does not identify the source of the mailing. 7d is identical to 7c and therefore is presumed to originate with the Rehn campaign, but this is not disclosed.
6. Rehn's campaign appears to have made a contribution to the Wirrick campaign (see Items 7c and 7d). This, as far as can be determined, is unreported.

² A copy of this advertisement is **not** enclosed in this Communication.

³ Copies of these handouts are not included in this Communication.

⁴ The original of this mailer is included in this Communication.

⁵ The pre-sorted postage amount is not identified on this Item, but in order for the US Post Office to guarantee delivery by Election Day (this Item was received on Monday, November 7), first class postage of 37 cents was almost certainly required.

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7. Robo calls for Rehn and Wirrick were not identified by source.
8. Campaign coordination between the King County Republican Central Committee and Wirrick appears to have occurred (see Item 16).
9. Given the vast similarities in format, content, color and size of the Rehn and Wirrick 5 ½ x 11 mailings, it appears that campaign coordination occurred between Rehn and the King County Republican Central Committee.
10. Given the estimated 5,000 handouts produced by Wirrick, the yard signs, the newspaper ad, the cost of creating⁶ and regularly updating a web site of at least eight pages; and the contributions by Rehn, the Republican party and the unknown source of the robo calls, Wirrick may have exceeded the direct and in-kind contribution and expenditure caps of mini-reporting.

There are several clear violations of the law by Rehn described above and several possible violations by Rehn and Wirrick in their respective campaigns that warrant PDC investigation.

Sincerely,



Scott Hamilton
19727 SE 19th St.
Sammamish, WA 98075-9639

Attachments

- 2005 Key Reporting Dates for Candidates
- A 5 ½ x 11 inch green and blue post card mailer, presorted US postage paid; date received not recorded (Item 7a);
- An 8 ½ x 11 inch green and blue post card mailer; presorted US postage paid; date received not recorded (Item 7b);
- A photocopied letter to Gail Twelves "From the Desk of Dino Rossi", first class postage postmarked October 31, 2005 ((Item 7c);
- A photocopied letter to Scott Hamilton "From the Desk of Dino Rossi"; first class postage postmarked November 1, 2005 (Item 7d);
- A photocopied letter "From the Desk of Cheryl Pflug", first class postage postmarked November 1, 2005 (Item 7e);
- An 8 ½ x 11 red and black postcard mailer, presorted postage paid, received on Monday, November 7 (Item 7f);
- Steve Wirrick Web Site Home Page showing at least 8 pages (Item 13);
- King County Republican Central Committee mailer for Steve Wirrick (Item 16).

⁶ The cost of creating my own similarly sized web site, in terms of the number of pages available on the website, was \$5,300 before any discounts. Such a value applied to Wirrick's website exceeds the \$3,500 mini-reporting cap for expenditures and even if no cash transactions were involved, the in-kind contribution would also exceed the \$3,500 mini-reporting cap.